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IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,))
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES))
FOR THE STATE OF OKLAHOMA,)

Plaintiff,)

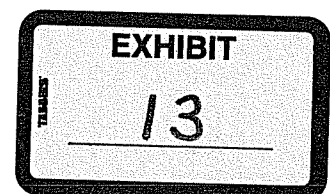
vs.) 4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al,)

Defendants.)

- - - - -
THE VIDEOTAPED DEPOSITION OF
ARCHIE SCHAFFER, produced as a witness on behalf
of the Plaintiff in the above styled and numbered
cause, taken on the 9th day of July, 2008, in the
City of Fayetteville, County of Washington, State of
Arkansas, before me, Lisa A. Steinmeyer, a Certified
Shorthand Reporter, duly certified under and by
virtue of the laws of the State of Oklahoma.

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1 as follows:

2 DIRECT EXAMINATION

3 BY MR. BULLOCK:

4 Q State your full name, please.

5 A Archie Schaffer. 09:12AM

6 Q And, Mr. Schaffer, how are you employed?

7 A I work for Tyson Foods, Incorporated.

8 Q What's your title?

9 A Senior vice-president for external relations.

10 Q What's that involve? 09:12AM

11 A It involves overseeing the government affairs,
12 public relations, community relations and internal
13 communications for the company.

14 Q What then is your relationship with Tyson
15 Chicken, for instance? 09:13AM

16 A Well, I'm not sure exactly what Tyson Chicken
17 is to tell you the truth.

18 Q Okay. How about Cobb-Vantress?

19 A Well, Cobb -- Cobb is a wholly-owned
20 subsidiary of Tyson Foods, and I have very limited 09:13AM
21 contact with Cobb. They are a breeding company that
22 Tyson owns, but I have very little regular contact
23 with them.

24 Q Okay. How long have you been with Tyson?

25 A Seventeen years. Came to work in June of '91. 09:14AM

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1 Q All of your -- the Tyson poultry are now grown
2 by what are known as contract growers within that
3 watershed?

4 A That's my understanding, although I'm, you
5 know, not directly involved in that, so -- but I 09:26AM
6 believe that to be the case.

7 Q And throughout the growing process, Tyson
8 continues to maintain ownership of the poultry?

9 A Yes.

10 Q They provide all of the feed? 09:27AM

11 A Yes.

12 Q And they own the feed?

13 A Yes.

14 Q And do you know when one of the birds die that
15 Tyson owns, whether Tyson continues to own that bird 09:27AM
16 or does the ownership of the carcass pass to the
17 grower?

18 MR. GEORGE: Object to the form, calls for
19 a legal conclusion. Answer, if you can.

20 A I don't know the answer to exactly who owns 09:27AM
21 the carcass. I do know that it's the responsibility
22 by contract of the grower to be -- you know, to be
23 responsible for the carcass, but I'm not sure who
24 owns it actually.

25 Q Now, and the same is true of the manure that 09:28AM

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